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UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION

FILED
JAN 16 2015
THOMAS G. BRUTON
CLERK, U.S. DISTRICT COURT

UNITED STATES OF AMERICA)	
)	No. 14 CR 580
v.)	
)	Judge Harry D. Leinenweber
GARY J. STERN)	

PETITION TO INTERVENE

Petitioners, Laveranues Coles, Terrell Owens, Jevon Kearse, Kenard Lang, Duane Starks, P. Mike Peterson, Santana Moss, Samari Rolle, Gerard Warren, Santonio Holmes, Eric Winston, Dexter Jackson, Plaxico Burress, Adalius Thomas, Frederick Taylor, Clinton Portis, Ray Lewis, Santonio Holmes, Bryce Fisher and Broward Energy Partners, GP, by their attorneys, KONICEK & DILLON, P.C. and REED SMITH, LLP (for Bryce Fisher) and respectfully move this Court to Intervene in this matter for the purposes of entering an order modifying the Protective Order entered in this case. In support thereof, the Petitioners state as follows:

1. Petitioners are Plaintiffs in a civil lawsuit in Cook County Case No. 11 L 7940 consolidated with 11 L 7941 and 11 CH 44662 captioned *Laveranues Coles, Terrell Owens, Jevon Kearse, Duane Starks, P. Mike Peterson, Santana Moss, Samari Rolle, Gerard Warren, Kenard Lang, Santonio Holmes, Eric Winston, Dexter Jackson, Plaxico Buress, Adalius Thomas, Frederick Taylor, Clinton Portis, Ray Lewis, Bryce Fisher and Broward Energy Partners, GP, a General Partnership v. Chuhak & Tecson, P.C., a Professional Corporation, and Gary Stern, individually, Jeanne Kerkstra, individually, David Shiner, individually, and Lindsey Markus, individually, Defendants.*

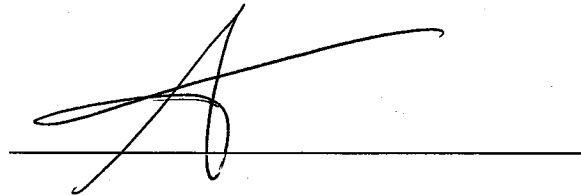
2. The issues involved in this case are directly related to Petitioners' civil action.

3. Petitioners seek to intervene for the sole purpose of modifying the protective order to allow production of limited documents to the Petitioners which are relevant in the Cook County civil matter. Petitioners are all investors in the Merrillville Trust, which is the tax shelter entity at issue in this case.

4. Accordingly, Petitioners request this Court to allow them to intervene in order to obtain limited discovery produced in this matter. As such, Petitioners attach their Motion to Modify this Court's Protective Order as **Exhibit A**, in the event this Court allows the Petitioners to Intervene.

WHEREFORE, Petitioners respectfully request that this Honorable Court enter an Order allowing them to intervene for the purpose of filing Petitioners' Motion to Modify the Protective Order and all other relief it deems just and appropriate.

Respectfully submitted,

A handwritten signature in black ink, appearing to be 'DK', is written over a horizontal line.

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